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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION - CINCINNATI

UNITED STATES OF AMERICA,

CASE NO. 1:22-45-69

Plaintiff,

JUDGE Dlott

v.

INDICTMENT

ALEX ROMAN NGUYEN,

18 U.S.C. § 2423(b)

Defendant.

18 U.S.C. § 2423(a)

THE GRAND JURY CHARGES:

## COUNT 1 (TRAVEL WITH INTENT TO ENGAGE IN ILLICIT SEXUAL CONDUCT)

On or around July 7 through July 16, 2022, in the Southern District of Ohio and elsewhere, the defendant, **ALEX ROMAN NGUYEN**, did travel in interstate commerce from California to Ohio for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Sections 2423(f), with another person who was not 18 years of age, to wit: M.M. who at the time was 15 years old.

In violation of Title 18 United States Code, Sections 2423(b).

## COUNT 2 (TRANSPORTATION WITH INTENT TO ENGAGE IN CRIMINAL SEXUAL ACTIVITY)

On or around July 16, 2022, in the Southern District of Ohio, the defendant, ALEX ROMAN NGUYEN, did knowingly transport and individual who had not attained the age of 18 years, to wit: M.M. who at the time was 15 years old, in interstate commerce by transporting M.M. from Ohio to Kentucky, with intent that the individual engage in sexual activity for which

any person can be charged with a criminal offense, namely, Rape in the third degree which was a criminal offense under Kentucky Revised Statute 510.60.

In violation of Title 18 United States Code, Sections 2423(a).

A TRUE BILL

GRAND JURY FOREPERSON

KENNETH L. PARKER UNITED STATES ATTORNEY

KYLEJ. HEALEY

ASSISTANT UNITED STATES ATTORNEY